

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Laura E. Bayer)	CHAPTER 13
Debtor)	
)	CASE NO. 1:22-bk-00497-HWV
M & T Bank)	
Movant)	
)	
Laura E. Bayer)	
)	
JACK N. ZAHAROPOULOS, TRUSTEE))	
Debtor/Respondent)	

**DEBTOR'S RESPONSE TO M & T BANK MOTION FOR RELIEF FROM THE
AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY
PROCEDURE RULE 4001**

1. Movant, M & T Bank, filed its Motion for Relief from Stay on September 29, 2022.
2. Debtor acknowledges some mortgage payments are past due.
3. Debtor desires the opportunity to cure any post-petition mortgage arrears and keep her home.
4. Debtor requests the Court deny Movant's Motion for Relief.

WHEREFORE, Debtor, Laura E. Bayer, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed September 29, 2022, by M & T Bank.

Dated: October 4, 2022

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